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CITIZENS FOR CLEAN POWER A nonprofit citizens group Lewes, Delaware

Citizens for Clean Power supports the efforts of Senator Harris McDowell and the SEU Task Force to promote energy conservation, residential solar power and other approaches that could reduce demand. However, there are some representations in the Task Force Report which cause us concern. These representations could conceivably be used by opponents of the Bluewater Wind bid (now before the Public Service Commission, for a decision on May 8, 2007) as justification to pressure for a delay or rejection of the offshore wind power bid.

We wish to address these major inaccuracies:

 "Energy efficiency, conservation and customer-sited renewables are the proven best insurance policy against price volatility."

We respectfully disagree. A Delaware offshore wind contract will act like a great energy price stabilizer, because it will act as a buffer against price hikes from coal/natural gas short-term contracts. Demand will continue to increase as Delaware's population grows and demands more energy. History argues that the cost of natural gas and coal will continue to rise. Because natural gas and coal plants require oil for production, we will continue to be vulnerable to price instability and homeland security concerns until we can integrate wind and other renewable power sources into our energy portfolio. Wind is a free, stable, clean domestic resource. Despite the modest reductions in energy consumption which can be achieved by 2019 from conservation and energy efficiencies, the continuing, inevitable rise of coal and natural gas costs will result in the same high out-of-pocket expense to the public. Delaware has a fantastic resource in pollution-free offshore wind, which can bring new jobs and economic vitality quickly to the state, if we seize the opportunity now. Four years after contract approval, offshore wind power would be operating, providing that insurance policy which SEU legislation can only hope will materialize by 2019 from conservation and energy efficiencies.

The Task Force Report touts the virtues of demand side measures (conservation, residential solar, etc.) when compared to supply side measures (offshore wind, coal, gas). This is like comparing apples to oranges. Both are valuable; both are needed now. To compare simply invites "either/or" thinking — only perpetuating the delay in curtailing harmful emissions from outdated coal and natural gas plants.

 "Better than all other options, energy efficiency, conservation and customer-sited renewables cut emissions that harm human health because these 3 tools reduce the use of existing facilities. The cleanest new utility-scale power plant cannot match this benefit; new utility plants can only slow down the rate of release of future, health harming pollution. This last sentence is not true if, as anticipated, increased demand should outstrip conservation efforts. Energy efficiency, conservation and customer-sited renewables will not reduce the use of existing facilities because demand will continue to grow. Last year, the Legislature passed HB6, requiring that Delaware seek long-term contracts for new energy in Delaware. In January, 2007, the Legislature had the opportunity to rescind or amend HB6 if they were unhappy with long-term contracts. THEY CHOSE NOT TO CHANGE ANYTHING. There is no evidence that conservation, efficiency and customer-sited renewables will cut emissions, because there is no evidence whatsoever that such measures will actually reduce demand — not in a state where population growth is projected at 1-2% per year. To reduce pollution, additional controls must be put in place on existing power plants, or the existing units will have to be replaced by cleaner generation sources in the power grid. Those clean energy sources should be in Delaware, for Delaware.

 "Conservation & supply side renewable energy sources could result in a peak load reduction of 400MW."

The task force report projection of potential savings depends upon a market in Delaware for more energy efficient goods. It makes no assessment of the goods in place already and the remaining useful life. Product credits for energy efficiency are already in place, but they have done little to slow demand for more load.

The offshore wind project could supply as much as 600MW of power to Delaware in four years. The SEU estimates cover 13 years, to 2019, assuming citizen cooperation.

• "... [T]he difference in building code standards, as well as targeted incentives, account for part of the difference in energy efficiency."

It is noteworthy that the Report makes no mention of new legislation that would require all new homes to be built to Energy Star standards, or for all state buildings to have geothermal units or otherwise follow green energy standards, or for all new state vehicles to adhere to minimum mileage requirements. Without such legislation in force, the goals of the Task Force could be compromised.

"Energy efficiency and conservation provide the cheapest and cleanest energy service we can
possibly use even when it is raining and the when the wind is not blowing."

Wind turbines make power in the rain, in the snow, and in the sun. The proposed wind farm is rated at a minimum of 120MW; that rating is expected to increase over the next 3 years. Offshore wind will produce power 85-89% of the time. When it doesn't, we have coal and natural gas capability in place already. The PSC's own consultant, Barry Sheingold, confirmed that conservation and residential solar power will not be enough to meet Delaware's future power needs. The offshore wind farm will take 2 years for permitting approvals, and 2 years to build. Make a decision now to bring more clean, price-stable power for Delaware.

• Delaware can reduce the energy intensity of its residential sector.

Energy intensity (energy consumed per \$100,000 of income) is NOT the same as carbon dioxide (CO2) emissions. Without new, pollution-free power, CO2 emissions will keep going up, even if energy intensity goes down.

"SEU approach promotes technology innovation."

On the contrary, the SEU promotes an existing technology, solar power, which is not a viable retrofit for most homes. For instance, it would take 25 years for a Sussex county homeowner using a 1000kw/month home to recoup the cost for a solar installation, even if 50% of the cost was subsidized by Delaware. This limits solar installations largely to new construction where the cost can become part of the mortgage. If Habitat for Humanity can build solar assisted homes, why can't Delaware builders? Why does the Report not mention the importance of new legislation to mandate Energy Star construction standards? And individual residential wind power units are not cost-effective in most areas of Delaware, where wind is not consistent or strong enough to generate significant savings.

In conclusion, Citizens for Clean Power supports energy conservation and promotion of solar power and geothermal heat. However, of grave importance at this point in time is the reduction of fossil fuel pollution. America has made little progress in reducing its consumption of power-gobbling goods (SUVs, Plasma Televisions), and experts agree that conservation is an important part of the solution, but will require sacrifices on the part of consumers, which we have not yet seen. In the meantime, Delaware must address its immediate problems of high pollution and the resulting deaths, disease and degradation of the environment. This Report should not be used as an excuse to avoid action to address a new, clean, price-stable energy source, such as offshore wind.

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